

State, of California. California Environmental Protection Agency

Department of Toxic Substances Control

SUMMARY OF VIOLATIONS

On March 17, 18, 19 & 21, 2003, Department of Toxic Substances Control (DTSC), California Environmental Protection Agency, conducted an inspection at:

Facility Name: Lawrence Livermore National Laboratory (LLNL)

Facility Address: 7000 East Avenue, Livermore, California 94550

EPA ID Number: CA2 890 012 584

County Name: Alameda County

As a result of that inspection, the violations of hazardous waste laws, regulations, and requirements listed on the attached pages were discovered. All violations must be corrected; the actions you must take to correct the violations are listed with each violation. If you disagree with any of the violations or proposed corrective actions listed in this Summary of Violations, you should inform DTSC.

DTSC will provide you a complete inspection report within 65 days of the date of this inspection. You may request a meeting with DTSC to discuss the inspection or the findings of the report.

The issuance of this summary of Violations does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted in the Summary of Violations.

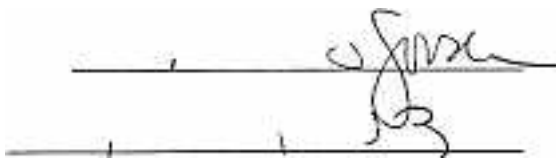
Authorized Company Representative

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Authorized State Agent

Name Luz T. Castillo

Title Senior Hazardous Substances Scientist

Signature Luz J. Castillo

Date APRIL 10, 2003

Page 1 of 5

State of California - California Environmental Protection Agency

Department of Toxic Substances Control

SUMMARY OF VIOLATIONS

Facility Name: Lawrence Livermore National Laborato~

VIOLATIONS

Failure To Provide a Review of Initial Training

Date: A Qril1 0.2003

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LLNL violated Health and Safety 252029(a), California Code of Regulations, title 22, section 66264.16(c) in that on or about March 17,2003, the required refresher training for Hazardous Waste Management employees were not provided or completed, to wit:

James Bertao. Legac~ Waste Technician

HS4610, Basic Respirator Training; frequency: 12 months, last completion date - 6/30/98;

HS4630, Self-contained Breathing Apparatus; frequency: 12 months, last completion date- 4/11/00;

HS5690-CERT, Incidental Crane Safety Certification; frequency, 60 months, last completion date- not shown on the record provided; training record as of March 18, 2003 shows the due date for the course as "NOW".

Bradle~ Francis. Lab Pack Technologist

EP5200-005, Field Sampling, frequency: 24 months, last completion date- 8/25/00;

EP5200-006, Hazardous Waste Sampling Operations; frequency: 24 months, last completion date- 8/14/00;

Hen[y Muro. Storage Driver

EP5102-003, Reading Program: Management and Operations Personnel; frequency: 12 months, last completion date- 12/26/01;

EP5120-033, Waste Management Unit Inspection, Procedures, and Emergency Response, Liquid Waste Pumpouts; frequency: 24 months, last completion date- 2/27/01 :

EP5120-038, Waste Management Unit Inspection, Procedures, and Emergency Response, 1 ODD-gallon vacuum tanker; frequency: 24 months, last completion date- 2/27/01;

Page 2 of 5

~umma!;y of Violations

Gilbert Ramirez. Area 612 Storage Tech

EP5120-039, Waste Management Unit Inspection, Procedures, and Emergency Response, Receiving and Segregation; frequency: 24 months, last completion date-1/15/01.

Joseph Salazar. Storage Driver

EP055-100, Hazardous Waste Shipping; frequency: 36 months, last completion date- 3/16/00;

EP5120-022, Waste Management Unit Inspection, Procedures, and Emergency Response, Building 693 Container Storage Units; frequency: 24 months, last completion date- 2/2/01 ;

EP5120-039, Waste Management Unit Inspection, Procedures, and Emergency Response, Receiving and Segregation; frequency: 24 months, last completion date- 2/2/01; .

HS5690, Incidental Crane Safety; frequency: 60 months, last completion date- 10/07/99; training record as of

March 18,2003 shows the due date for the course as "NOW".

HS5690-CERT, Incidental Crane Safety Certification; frequency: 60 months, last completion date- 03/03/00; training record as of March 18, 2003 shows the due date for the course as "NOW",

Ro~ Warner. Material Storage Technologist

EP055-100, Hazardous Waste Shipping; frequency: 36 months, last completion date- 3/16/00.

Compliance Action

Within 30 days of receipt of this report, LLNL shall submit to DTSC documentation that the required courses for the above employees have been completed.

Page 3 of 5

Summary of Violations

2.

3.

LLNL has taken steps to correct the following violations.

Storage Greater Than One Year

LLNL violated Health and Safety Code, section 25202 (a), California Code of Regulations, title 22, section 66270.30 (a) and Hazardous Waste Facility Permit (HWFP) ,Parts 111.2. (b) and IV.10 (a) in that, on or about April 12 and September 19, 2001, two containers of mixed wastes were being stored for greater than one year in Area 612, to wit:

a. Container QOO043498/W154435, spent organic solid lab trash, waste codes- FO02, FO05, 352, TSDF start date- 04/11/00;

b. Container QOO053568/W154136, spent organic lab trash, waste codes-D040, 352, TSDF start date- 09/18/00.

Compliance Action

LLNL submitted a storage extension request to DTSC on April 12, 2002 for the above containers. No additional submittal is required at this time.

Failure To Maintain Aisle Space

LLNL violated Health and Safety Code, section 25202 (a), California Code of Regulations, title 22, sections 66270.30 (a), and 66264.35 in that on or about March 17, 2003, LLNL failed to maintain the required aisle space in Building 614 west - 1002 container storage area, to allow the unobstructed

movement of personnel, fire protection equipment, spill control and decontamination equipment, in an emergency.

Compliance Action

No further action is required. LLNL has corrected the problem by rearranging the containers and relocating some of the containers to another storage cell.

Operating Record Discrepancies

4. LLNL violated LLNL violated Health and Safety Code, section 25202 (a), California Code of Regulations, title 22, sections 66270.30 (a) and 66264.73 in that on or about March 17, 2003, operating records did not accurately reflect the container

Page 4 of 5

Summary of Violations

information and/or location, to wit:

a.

b.

c.

d.

e.

Containers 000060940,000064308,000064309,000067581,000067582, 000067583 shipped to Safety Kleen on August 28,2002, accompanied by manifest no. 21766457, were recorded as being stored in Building 693-1004 in the Container Contents Report (CCR).

Containers 000067581,000067582,000067583 received from LLNL Site 300, on January 10, 2002, manifest 99555539, were recorded with a TSDF start date of December 18, 2001.

Containers 000048933,000067464,000047694,000050372, and 000054925 shipped to Heritage on February 1, 2002, accompanied by manifest number 99555562, were recorded as being stageOd for shipment (i.e.: Location on CCR- "Stage"

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The location and TSDF start date for container 000075751 was missing on the CCR;

The TSDF date on the CCR (8/9/00) was different from the TSDF date observed on the drum label (7/19/01) on

container 000075725.

Compliance Action

No further action is required. LLNL has submitted corrected CCR's for the above containers, showing the correct information/status (i.e. "Shipped" for waste sent off- site); and actual TSDF start date.

Page 5 of 5